

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
GREENBELT DIVISION

**JOHN HILL**

23564 Gunnel Dr.

Leonardtown, MD 20650

**RESPONDENT/PLAINTIFF**

FILED  
LODGED  
ENTERED  
RECEIVED

OCT 31 2013

AT GREENBELT  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

DRP

**V.**

**CASE NO. RWT 13-524**

**WILMINGTON FINANCE, INC.**

401 Plymouth Road, Ste. 400

Plymouth Meeting, PA 19462

**COMPLAINANT/DEFENDANTS**

**RESPONSE TO THE DEFENDANTS' OPPOSITION TO  
THE PLAINTIFF'S MOTION CRAVING OYER**

COMES NOW the Plaintiff, John Hill, in response to the Defendants' Opposition to the Plaintiff's Motion Craving Oyer. In response to that document, the Plaintiff hereby presents the following facts and allegations.

1. The Plaintiff agrees that he did file suit against all of those Defendants in Charles County Circuit Court on or about January 14, 2013 and the case was removed to this Court (over the objections of the Plaintiff) on or about February 15, 2013.
2. The Plaintiff does agree that several of the Defendants have moved to Dismiss the Complaint and that Motion is pending (as is the Plaintiff's Response to that Motion).
3. The Plaintiff agrees that he did file a Motion Craving Oyer on or about July 8, 2013.
4. The Plaintiff did, in his Motion Craving Oyer, that this Court compel the production of certain documents and information related to the ALLEGED mortgage loan relevant to the Quiet Title Complaint.
5. The Plaintiff does hereby maintain and allege that his request is NOT premature in that...
  - A. No proper Answer to the Complaint was ever filed by any of the Defendants.
  - B. Dismissal is improper without rebuttal of allegations in said Complaint.
  - C. The Documents and Information requested in the aforementioned Motion Craving Oyer have been demanded repeatedly since long before this suit was filed.

D. Without said documents and information these Defendants have NO defense against the allegations in the Complaint.

WHEREFORE, the Plaintiff does hereby maintain and allege that these Defendants, without posing any sort of substantial defense, are NOT entitled to a dismissal of this matter. Furthermore, the Plaintiff does also maintain that it is his right to obtain the information and documentation that the Defendants MUST have in order to make any claim to the Property which is at the heart of this dispute. The refusal of the production of the aforementioned information and documents is a violation of the Plaintiff's Sixth Amendment Rights in that he is being threatened with the theft of his Property. As such, the Plaintiff repeats his plea that this Court does either compel these Defendants to provide concrete evidence of their claims, or, that Judgment will be awarded to the Plaintiff without further delay.

Respectfully submitted and signed.



John Hill (Respondent)

### VERIFICATION

I, John Hill, am the Respondent in the above-entitled action. I have read the foregoing and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in the State of Maryland.



John Hill (Respondent)

### CERTIFICATE OF SERVICE

I, John Hill (Respondent), do hereby swear and attest that I have delivered a copy of this filing of this document to each of the following individuals and/or entities pursuant to the laws of the State of Maryland...

1)Wilmington Finance, Inc.

401 Plymouth Rd. Ste 400

Plymouth Meeting, PA 19462

2)Nationstar Mortgage

350 Highland Drive

Lewisville, TX 75067

3)Countrywide Home Loans, Inc.

4500 Park Granada Blvd.

Calabassas, CA 91302-1613

4)CWABS, Inc.

4500 Park Granada Blvd.

Calabassas, CA 91302-1613

5)Countrywide Home Loans Servicing LP

4500 Park Granada Blvd.

Calabassas, CA 91302-1613

6)The Bank of New York Mellon

1 Wall Street, Manhattan

New York, NY 10005

7)International Mtg Co

450 N Brand Blvd Ste 150

Glendale, CA 91203

8)Wells Fargo Bank NA

420 Montgomery St

San Fransisco, CA 94104

9)Premium Capital Funding LLC

125 Jericho Turnpike Ste 400

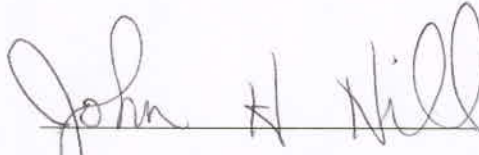
Jericho, NY 11753

10)CIT Group/Consumer Finance, Inc.

8000 Sagemore Dr. Ste 8202

Marlton, NJ 08053

Each of these copies was delivered via USPS, certified mail, restricted delivery as demanded by the Code of Maryland, Rules of Civil Procedure on this, the 20 day of SEPTEMBER in the year 2013.

A handwritten signature in black ink, appearing to read "John H. Hill". The signature is written in a cursive style with a horizontal line underneath the name.

John Hill (Respondent)

**ATTACHMENTS/EXHIBITS**

Exhibit A – PLAINTIFF’S MOTION CRAVING OYER WITH ATTACHMENTS